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April 3, 2025

VIA ECF

The Honorable Christine P. O'Hearn
United States District Court
District of New Jersey, Camden Division
Mitchel H. Cohen Building & United States Courthouse
4th and Cooper Streets,
Camden, New Jersey 08101

RE: *Angela Roberts v. Unlock Partnership Solutions, AO1, Inc., et al.*
D.N.J. Case No.: 1:24-cv-01374-CPO-AMD

Dear Judge O'Hearn:

At the hearing concerning the Show Cause Order [ECF No. 52] on February 20, 2025, the Court ruled that Plaintiff would file a second amended complaint to address the issues discussed. During that hearing, the Court further requested that, within fourteen (14) days of Plaintiff filing a second amended complaint, Defendant Unlock Partnership Solutions AO1, Inc. ("Unlock"), submit a letter advising if it would like to proceed with a new motion to compel arbitration, or rely on its prior motion [ECF No. 26]. Plaintiff filed a Second Amended Complaint on March 20, 2025 [ECF No. 79], so this letter is being submitted timely.

After reviewing the amended allegations, and exhibits thereto, Unlock respectfully requests leave to file a new motion to compel arbitration within thirty (30) days of the Court granting this request. Additionally, Unlock respectfully requests that all other deadlines, including without limitation Unlock's deadline to answer or otherwise respond to the Second Amended Complaint [ECF No. 79] and all discovery-related deadlines, be stayed while the parties brief and the Court considers whether to compel arbitration on the disputes presented in this action.

Thank you for your careful consideration of this matter.

Dated: April 3, 2025

Respectfully Submitted,

/s/ Jason R. Lipkin, Esq.

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CC: *All counsel of record (Via ECF)*